

**REMARKS**

The Office Action dated April 30, 2010, has been carefully reviewed. The following remarks form a full and complete response thereto.

Claims 1-10 were previously canceled without prejudice or disclaimer. Claims 25-28, 30 and 31 were not examined by the Examiner. *See* Office Action at p. 2. Although not mentioned in the Detailed Action portion of the Office Action, claims 25-28, 30 and 31 appear to have been withdrawn from consideration. *See* Office Action Summary. Claims 11-24 and 29 have been amended. No new matter has been added.

**Rejection of Claims 35 U.S.C. § 102(e)**

Claims 11, 12, 19-21 and 29 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent Application Publication No. 2003/0167455 to Iborra *et al.* (“Iborra”). Applicants respectfully traverse the rejections for the following reasons.

**Independent Claim 11**

Claim 11 is patentable over Iborra because Iborra fails to disclose each and every feature of claim 11. For example, Iborra does not disclose causing a computer to “**distribut[e]** said description **between** several code generators according to **modifiable** distribution rules,” as recited in claim 11. (emphasis added).

The Examiner alleges that Iborra discloses this feature in Fig. 2 and the related text. Office Action at p. 3. At the cited portions, Iborra discloses a **statically predefined manner** to send the **full** application specification 215, once validated by validator 220, to a closed list of four predefined generators (i.e., system logic translator 232, user interface translator 234, database generator 236 and documentation generator 238). Iborra at Fig. 2 and ¶ 0083-0085. Each of four generators generate a code of different type (e.g., one of system logic,

user interface code, database schema and documentation) from the full specification 215, and there is **nothing** in Iborra that even suggests that the manner in which formal specification 215 is sent to each of the four generators is modifiable in any way. To the contrary, the manner in which the formal specification 215 of Iborra is statically sent to the four generators is **not modifiable**.

Furthermore, because Iborra sends the **full** specification 215 to **each** of the four generators, the method of Iborra does **not distribute** parts of formal specification 215 between the four generators.

Accordingly, Applicants respectfully submit that Iborra discloses **neither** distributing a description “**between** several code generators” **nor** distributing a description “according to **modifiable** distribution rules,” and the rejection of claim 11 is improper. (emphasis added). Applicants respectfully request reconsideration and withdrawal of the rejection.

#### Dependent Claim 12

Claim 12 depends on claim 11 and are patentable over Iborra for the same reasons discussed above with regard to claim 11 as well as for the additional limitations they recite.

For example, claim 12 recites “distributing ... object classes between the code generators.” The Examiner alleges that the Iborra discloses this feature at ¶¶ 0011 and 0095. Office Action at p. 3. However, nothing in the cited portions, which merely disclose class information and an OBLOG approach respectively, can reasonably be understood as disclosing the claimed feature.

Iborra discloses that CASE tool 210, which gathers requirements 200 and stores them as a formal specification 215, preferably “employs object-oriented modeling techniques” and includes information about classes. Iborra at ¶¶ 0084 and 0095. However, Iborra does **not** disclose that object classes are distributed between generators 232, 234, 236 and 238. This

leaves the responsibility of choosing whether a given item of the specification 215 is to be generated by one of these four generators to each of these generators. Each of these generators is targeted at a given functional aim (i.e., system logic, user interface, database/data storage, or documentation). Iborra merely discloses in which manner each of four statically predefined generators generate code, but does **not** disclose how specific classes representing parts of the description of at least one part of a computer application are to be distributed between these generators.

Similarly, Iborra discloses an OBLOG approach that is based upon an object-oriented modeling. Iborra at ¶ 0011. Although the OBLOG approach may declare classes, there is absolutely no disclosure that that the OBLOG approach defines a way to **distribute** classes to several code generators.

Accordingly, Iborra does **not** disclose a manner of distributing object classes between code generators, and Applicants submit that the rejection of claim 12 is improper for this additional, independent reason.

#### Dependent Claims 19-21

Claims 19-21 depend, directly or indirectly, on claim 11 and are patentable over Iborra for the same reasons discussed above with regard to claim 11 as well as for the additional limitations they recite.

For example, claim 19 additionally recites that the “description [is] made in a language organized in object classes, in which said language enables to define first classes giving access to technical or functional services to be provided by a hardware and software computer platform receiving the computer application, said services being not definable by said language, and the other classes of said language cannot have access to any one of said services except through said first classes.” Iborra does not disclose this feature.

The Examiner asserts that Iborra discloses this feature in ¶ 0011. Office Action at p. 3. At the cited portion, Iborra discusses OBLOG, which is a conventional object-oriented approach for software development and “enables a developer to build a prototype by supplying rewrite rules to convert the specifications into code for the prototype.” Iborra at ¶ 0011. Because nothing in ¶ 0011 of Iborra can reasonably be understood as disclosing the features recited in claim 19, the rejection of claim 19 is improper for this additional, independent reason.

Independent Claim 29

Claim 29 is patentable over Iborra because Iborra fails to disclose each and every feature of claim 29. For example, similar to claim 11, claim 29 recites causing a computer to “**distribut[e]** said description **between** several code generators according to **modifiable** distribution rules.” (emphasis added). Iborra does not disclose this feature for the reasons set forth above in regard to claim 11, and the rejection of claim 29 is improper. Applicants respectfully request reconsideration and withdrawal of the rejection.

Allowable Subject Matter

Applicants thank the Examiner for indicating that claim 13 contains allowable subject matter and would be allowable if rewritten in independent form including all of the limitations of base claim 11 and intervening claim 12. However, for the reasons stated above, claims 11 and 12 are allowable over the cited prior art, and Applicants respectfully submit that claim 13 is allowable without being rewritten in independent form. Applicants respectfully request reconsideration and withdrawal of the objection to claim 13.

In addition, claims 14-24 depend on claim 13 and are allowable over the cited prior art at least the same reasons as is claim 13. Accordingly, Applicants respectfully submit that claims 13-24 are allowable over the cited prior art.

**CONCLUSION**

In view of the above, all rejections have been sufficiently addressed. Applicants submit that the application is now in condition for allowance and request that the Office allow all pending claims and pass this application to issue.

The Applicants respectfully petitioned for a one-month extension of time. Any fees for the extension together with any additional fees may be charged to Counsel's Deposit Account No. 02 2135.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

Respectfully submitted,

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